

SCHLANGER LAW GROUP LLP

MEMO ENDORSED

April 5, 2021

VIA ECF

Honorable Kenneth M. Karas
United States District Judge
Federal Building and United States Courthouse
300 Quarrapos Street
White Plains, NY 11722

Re: *Sessa v. Linear Motors, LLC d/b/a Curry Hyundai Subaru, et al.*
Case No.: 7:19-cv-9914 (KMK)

Your Honor:

My office represents Plaintiff and the putative class in the above-referenced matter. I write on consent to request an extension of time. Specifically, Defendant Trans Union recently filed a pre-motion letter in support of its anticipated motion for summary judgment. ECF Doc. 100.

Pursuant to Your Honor's order dated January 27, 2021 (ECF Doc. 98), the deadline to respond is April 7, 2021. Unfortunately, attorney Evan S. Rothfarb, who has been lead attorney on this matter in my office, including taking Defendants' fact and expert depositions and defending Plaintiff's fact and expert depositions, has had a family emergency and will be unexpectedly out of the office for the next two weeks, approximately. Specifically, Mr. Rothfarb's father unexpectedly passed away earlier today.

Accordingly, Plaintiff respectfully requests that her time to submit a pre-motion opposition letter be extended to April 30, 2021. This is the first time this deadline has been extended (other than scheduling orders relating to discovery cut-offs that necessitated corresponding extensions of the subsequent pre-motion letter deadlines). This request does not require adjustment of any other case deadlines.

Granted. Condolences to Mr. Rothfarb.

So Ordered.



4/6/21

Respectfully,

/s/ Daniel A Schlanger

Daniel A Schlanger

cc: All counsel of record